

# Washington State Alternatives Assessment Advisory Group



**Washington State Department of Ecology**

**10 July 2014**



# Working Agenda

<b>9:00 am</b>	<b>Welcome &amp; Introductions</b> <b>Maia Bellon, Executive Director</b>
<b>10:00 am</b>	<b>WA Alternatives Assessment Guide</b> <b>Discussion Draft</b>
<b>10:15 am</b>	<b>Break</b>
<b>10:30 am</b>	<b>Advisory Group Framing Questions</b>
<b>Noon</b>	<b>Next Steps &amp; Adjourn</b>

# Washington AA Guide Discussion Draft



**Alex Stone –Washington State  
Department of Ecology**

**Washington AA Workshop  
10 July 2014**

# WA AA Guide Discussion Draft

- Objectives of Washington AA Guide
- Framework used
- Modules selected
- Module order



# WA AA Guide Discussion Draft (cont.)

- Objectives:

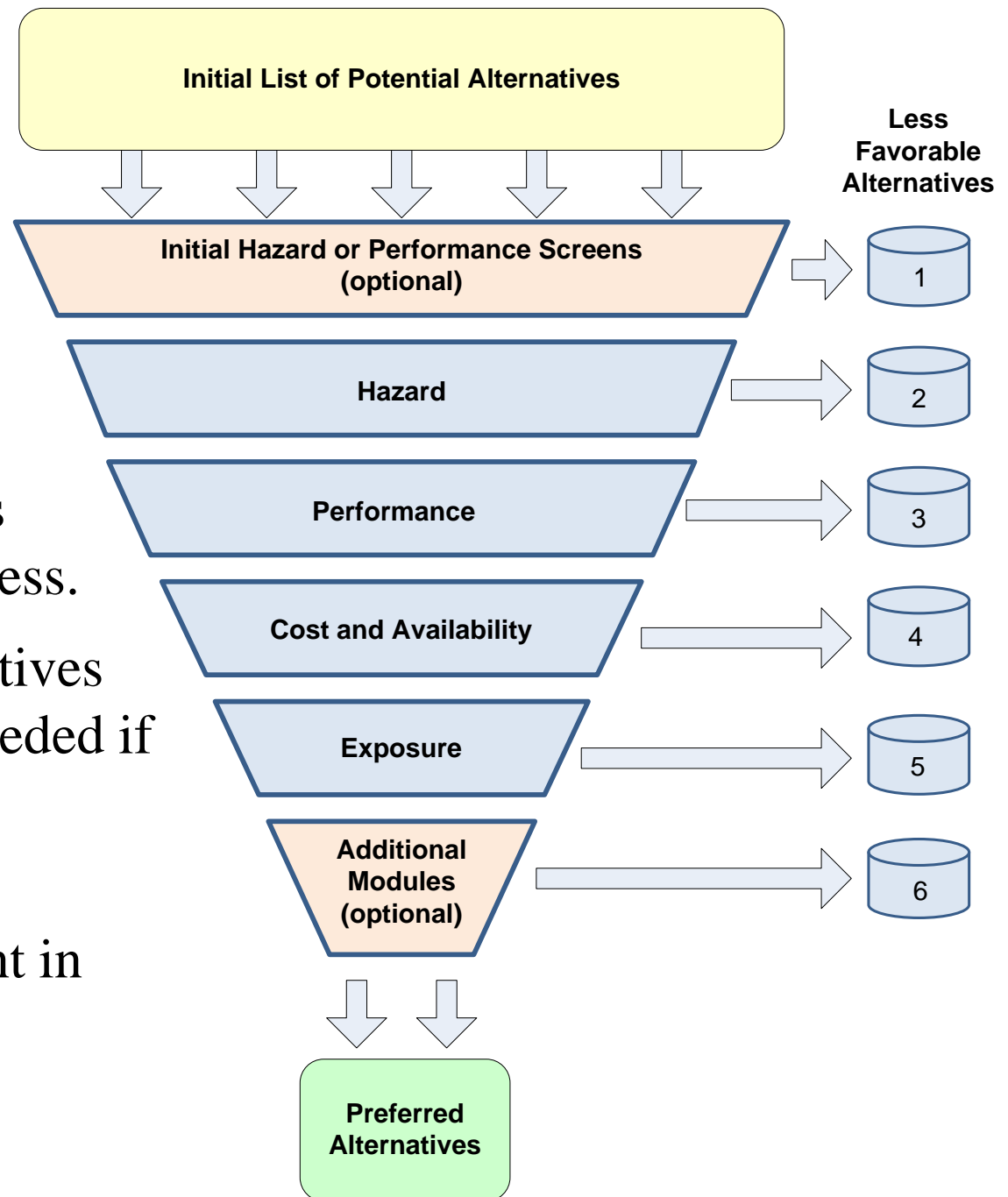
- Provide flexible framework that can be used by wide range of potential users (industry, NGOs, etc.)
- Places lowest burden upon small & medium businesses.
- Clear & concise.
- Transparent so consumers know products are safe.
- Demonstrate government is taking steps to guarantee product safety.
- In agreement with other AA work.

# WA AA Guide Discussion Draft (cont.)

- WA Guide recommends Sequential Framework:
  - Easiest framework to implement.
  - Least burden upon small and medium businesses.
  - No additional decision methodology as sufficient information for user to make decision.
  - Consistent with other AA work such as EPA DfE, the European Chemicals Agency, Organization for Economic Cooperation & Development (OECD) toolbox, BizNGO AA framework, etc.

# WA AA Guide Discussion Draft (cont.)

- Filters out less desirable alternatives.
- Preferable alternatives continue through process.
- Less favorable alternatives set aside as may be needed if no safer alternative identified.
- Decision logic inherent in modules.

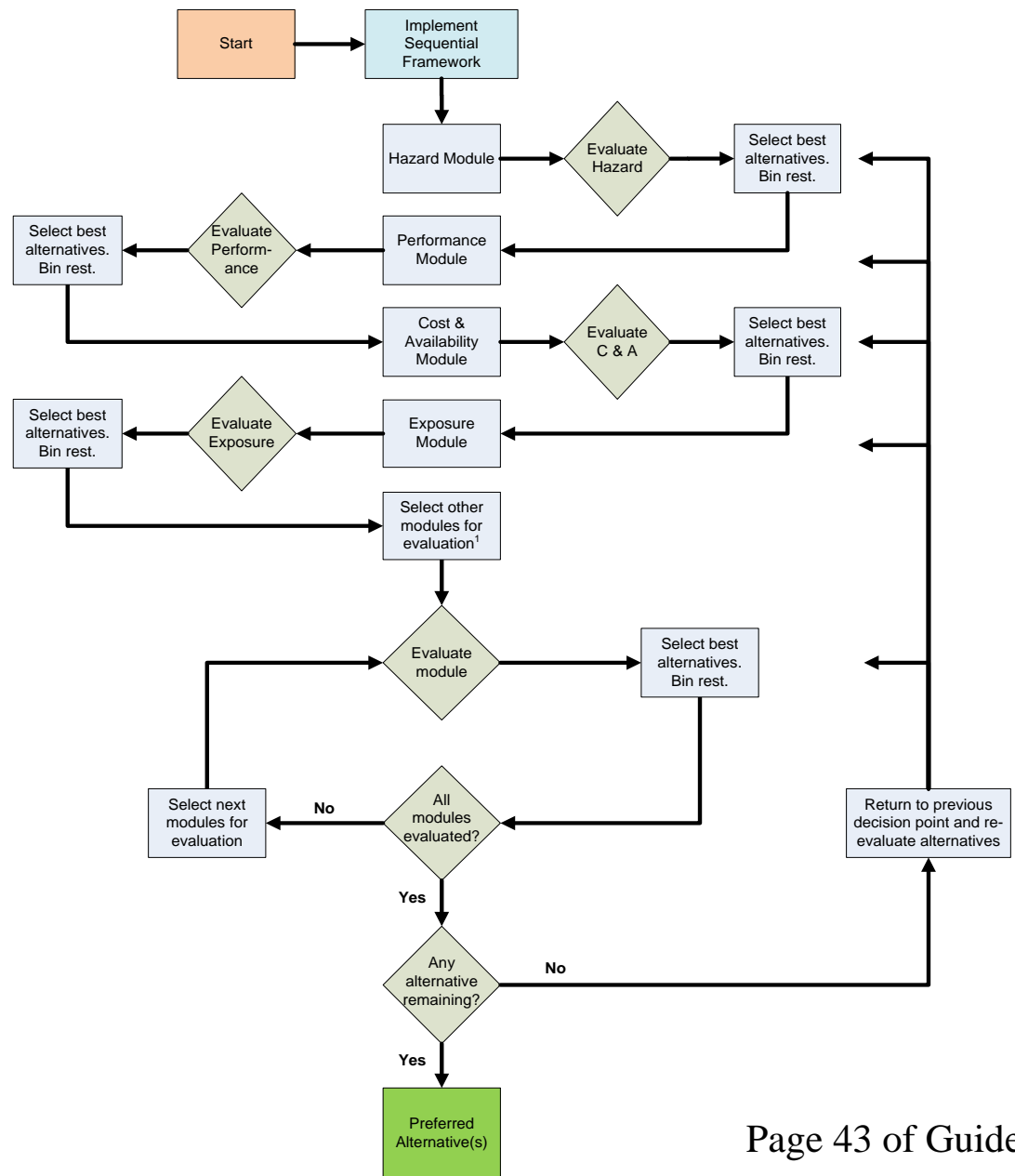


# WA AA Guide

## Discussion

### Draft (cont.)

- What happens if no alternatives exist at the end of the process?
- Return to the previous decision point.
- Review reasons for removal and see if any mitigation or other steps can be taken.
- Emphasis is on identifying the least hazardous alternative.



<sup>1</sup> The modules that remain are Stakeholder, Materials Management, Social Impact and Life-cycle. The user may select the modules, their order and the level of complexity for a specific alternatives assessment. This decision process should be documented.



# WA AA Guide Discussion Draft (cont.)

## Modules selected:

- Hazard
  - Initial Screen & Levels 1 or 2
- Performance
  - Level 1
- Cost & Availability
  - Level 1
- Exposure
  - Initial Screen & Level 1

# WA AA Guide Discussion Draft (cont.)

## Hazard:

- Basis for an alternatives assessment

<b>Initial Screen</b>	<i>Initial Screen:</i> Uses several readily available sources to evaluate whether a chemical, product or process appears on authoritative lists of hazard criteria.
<b>Level 1</b>	<i>Basic Evaluation:</i> Utilizes the Quick Chemical Assessment Tool (QCAT) to determine if hazards exist for specific hazard criteria using well-defined, readily available data sources.
<b>Level 2</b>	<i>GreenScreen<sup>®</sup> Evaluation:</i> Uses the GreenScreen <sup>®</sup> for Hazard Assessment tool (GreenScreen <sup>®</sup> ) to conduct thorough hazard evaluation. GreenScreen <sup>®</sup> is a free, publicly available chemical hazard assessment tool.

# WA AA Guide Discussion Draft (cont.)

## Performance:

- Proves ability of alternative to function in product

<b>Level 1</b>	<i>Basic Performance Evaluation:</i> Identifies a few, very basic questions about whether the alternative performs the required function in the product. This level uses qualitative information readily available from manufacturers and other sources to evaluate alternatives.
----------------	---

## Cost & Availability:

- Determines if alternative is available in sufficient quantity & at cost effective price

<b>Level 1</b>	<i>Basic Cost and Availability Evaluation:</i> This evaluation asks a few, very basic questions about whether the alternative is being used in cost competitive products. If yes, the alternative is considered feasible.
----------------	---

# WA AA Guide Discussion Draft (cont.)

## Exposure:

- Initial Screen: Determines if exposure potential is sufficiently similar that exposure does not play a role.
- Level 1: If sufficient concern about exposure potential, conducts a qualitative evaluation.

<b>Initial Screen</b>	<i>Initial Exposure Assessment Evaluation:</i> Identifies whether sufficient similarities exist between the chemical of concern and potential alternative(s), such that an exposure assessment is not necessary. If so, differences in exposure concerns between the chemical of concern and potential alternatives are inconsequential to the AA.
<b>Level 1</b>	<i>Basic Exposure Evaluation:</i> Identifies potential exposures concerns along with how the concerns may be addressed. Decisions in this level are based upon a qualitative assessment using readily available data.

# WA AA Guide Discussion Draft (cont.)


## Modules order:

- Hazard
  - Performance
  - Cost & Availability
  - Exposure
- Recommended order in the IC2 AA Guide.
  - Emphasizes importance of hazard in reducing risk.
  - Emphasizes importance of Performance and Cost & Availability.
  - Recognizes exposure potential may be important factor to consider



# WA AA Guide Discussion Draft (cont.)

## Modules order:

- Hazard
  - Performance
  - Cost & Availability
  - Exposure
- 
- Recommended order in the IC2 AA Guide.
  - Emphasizes importance of hazard in reducing risk.
  - Emphasizes importance of Performance and Cost & Availability.
  - Recognizes Exposure potential may be important factor to consider

# WA AA Guide Discussion Draft (cont.)

## Module Order (cont.):

- In agreement with other AA methodologies including EPA DfE, Organization of Economic Cooperation and Development (OECD) toolbox, BizNGO alternatives assessment methodology, etc.
- Creates methodology for evaluating effect of toxic chemicals upon human health and the environment.



# WA AA Guide Discussion Draft (cont.)

## Conclusions:

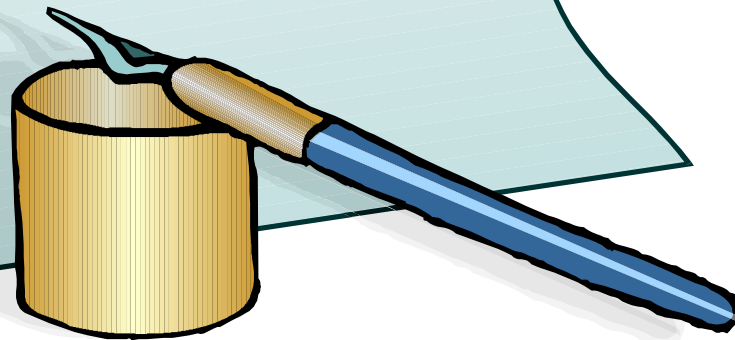
- WA Guide meets all objectives.
- Is clear and concise.
- Flexible as more detailed AAs can be done using other Frameworks.
- Transparent and provides consumer with confidence products for sale are protective of human health and the environment.
- Does not place an undue burden upon small and medium businesses.





*Questions?*

*Comments?*



# Advisory Group Framing Questions

What's your input on the minimum core modules in the WA discussion draft?

What's your input on the appropriate use of the optional modules?

What other suggestions do you have to improve the format of the AA discussion draft guide?

# Advisory Group Framing Questions

What can Ecology, industry, nonprofits, tribes, and local governments do to support the development of a “community of practice” on the use of AAs in Washington State?

What are the educational and technical assistance needs, particularly for small and medium businesses with limited resources and expertise?

# Advisory Group Framing Questions

What suggestions do you have for creating incentives to advance the use of AAs?

## Next Steps

- National Academy of Science AA Report
- RCW 70,300 Antifouling paints – Copper Boat Paint RFP
- Scheduling Follow-up:
  - Conference Calls
  - September Meeting Date
  - Other Items

# RCW 70.300 Antifouling Paints – Copper Boat Paint RFP

Create a uniform data set to use during evaluation of the Guide. Conduct chemical hazard assessments of alternatives identified in a uniform data set related to alternatives in copper boat paint. Technical content and structure of the Guide not being changed.

Conduct three draft alternatives assessments using the uniform data set and the three frameworks described in the Guide.

Evaluate the ability of new users to conduct an alternatives assessment using the Guide.

- Identify and make recommendations to Ecology on any portions of the Guide that require further clarity to improve user friendliness. Identify any areas that can be improved and provide recommendations on changes to the document, if warranted.
- Identify the results of the three alternatives assessments and describe:
  - 1) What safer alternatives to copper are identified based upon the uniform data set.
  - 2) Compare the alternatives identified using the three frameworks. If different alternatives are identified, provide possible reasons for the variability in results.
- Determine what the evaluation of the Guide says about alternatives to copper boat paint. This information will be used as the start of a more detailed stakeholder process and further alternatives assessment work using additional data.

# National Academy of Sciences AA Review

- Commissioned by EPA to review and provide comment on the AA process used by EPA's Design for the Environment Program.
- Provide input on the AA process in general.
- Committee member selected early in 2014.
  - NAS members including AA practitioners and experts in Green Chemistry and Toxicology.
- Final report expected in August.
- Ecology is following process closely.